UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE APPLICATION OF SHERVIN PISHEVAR FOR AN ORDER TO TAKE DISCOVERY FOR USE IN FOREIGN PROCEEDINGS PURSUANT TO 28 U.S.C. § 1782

APPLICATION AND PETITION FOR AN ORDER TO CONDUCT DISCOVERY FOR USE IN FOREIGN PROCEEDINGS PURSUANT TO 28 U.S.C. § 1782

Petitioner Shervin Pishevar ("Petitioner"), pursuant to 28 U.S.C. § 1782 and Federal Rules of Civil Procedure 26, 30, 34, and 45, respectfully applies to this Court for an order in the form attached as Exhibit 1 to the Declaration of Lucas Bento dated October 31, 2019 (the "Bento Declaration") authorizing Petitioner to take expedited discovery for use in contemplated criminal and civil proceedings in the United Kingdom in the form of the subpoenas attached as Exhibit 2 to the Bento Declaration. In support of his application and petition, Petitioner submits a Memorandum of Law and attaches the Declaration of Lord Macdonald of River Glaven Kt QC dated October 31, 2019, the Declaration of Charlotte Watson dated October 31, 2019, and the Bento Declaration.

Dated: October 31, 2019 Respectfully submitted,

/s/ Lucas V.M. Bento

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